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GRASS ROOTS NONPROFIT COLLECTIVE

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Petitioner,

v.

GRASS ROOTS NONPROFIT  
COLLECTIVE INC.,

Respondent .

**No. CV 13 5780 SC**

**STIPULATION AND ~~PROPOSED~~  
ORDER RESCHEDULING HEARING  
ON ORDER TO SHOW CAUSE AS TO  
WHY SUMMONS SHOULD NOT BE  
ENFORCED AND EXTENDING  
DEADLINE FOR RESPONDENT TO  
RESPOND**

**Petition Filed: December 13, 2013  
The Honorable Samuel Conti**

1. WHEREAS, this Court previously ordered that Respondent Grass Roots Nonprofit Collective, Inc. file a written response to the Court's Order to Show Cause by March 3, 2014.

2. WHEREAS, this Court previously ordered that a hearing on the Order to Show Cause be held on March 21, 2014 at 10:00 A.M.

3. WHEREAS, counsel for Petitioner and counsel for Respondent are presently negotiating a resolution to this petition that may eliminate the need for the Court to issue a ruling, the parties have agreed to continue the presently pending deadline and hearing date.

THE PARTIES HEREBY STIPULATE AS FOLLOWS:

1. The time for Respondent to respond to the Order to Show Cause is hereby continued 60 days to May 2, 2014, and the hearing on the Order to show cause is hereby continued to May 20<sup>th</sup>, at a time convenient for the court.

/s/ Thomas Moore  
THOMAS MOORE  
Assistant United States Attorney  
Tax Division  
*Counsel for Petitioner*

/s/ Henry Wykowski  
HENRY WYKOWSKI  
*Counsel for Respondent*

**[PROPOSED] ORDER**

GOOD CAUSE APPEARING, and in the interests of justice, it is hereby ordered that the deadline for Respondent to file a response to the Order to Show Cause is hereby continued to May 2, 2014, and the hearing on the Order to Show Cause is hereby continued and shall be held on ~~May 20<sup>th</sup>~~ ( May 30, 2014 ) at 10:00 a.m. .

SO ORDERED

03/06/2014  
DATE

